

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re

FTX TRADING, LTD., *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

**VERIFIED STATEMENT OF EVERSHEDS SUTHERLAND (US) LLP AND MORRIS, NICHOLS, ARSHT, & TUNNELL LLP PURSUANT TO BANKRUPTCY RULE 2019**

Eversheds Sutherland (US) LLP (“Eversheds”) and Morris, Nichols, Arsh & Tunnell LLP (“Morris Nichols,” and together with Eversheds, “Counsel”), counsel to the Ad Hoc Committee of Non-US Customers of FTX.com (the “Ad Hoc Committee”) comprised of 27 customers (each a “Member”) of the FTX.com platform representing over \$2.0 billion in claims against the Debtors on a dollarized basis, submit this verified statement (the “Verified Statement”) pursuant to Rule 2019 of the Federal Rules of Bankruptcy Procedure (“Bankruptcy Rule 2019”), and respectfully state as follows:

1. Attached hereto as Exhibits A-1 through A-27 are tables providing the names of each current Member of the Ad Hoc Committee, and each Member’s disclosable economic interests in accordance with Bankruptcy Rule 2019.<sup>2</sup> The information contained in the exhibits is based upon information provided to Counsel by the Members of the Ad Hoc Committee. Given

<sup>1</sup> The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification numbers are 3288 and 4063, respectively. Due to the large number of debtor entities in these chapter 11 cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ proposed claims and noticing agent at <https://cases.ra.kroll.com/FTX>.

<sup>2</sup> Nothing set forth herein is intended to be or shall be an admission that any of the Ad Hoc Committee Members’ interest in property held by the Debtors constitute disclosable economic interests for purposes of Bankruptcy Rule 2019.

that the Debtors have disabled access to the FTX.com platform, the Members are unable to access their accounts and the information provided is therefore based on the best available records and is subject to change.

2. On or around December 2, 2022, the initial Members of the Ad Hoc Committee engaged Eversheds to represent the Ad Hoc Committee in connection with the above-captioned chapter 11 cases (the “Chapter 11 Cases”) of the above-captioned debtors and debtors in possession (the “Debtors”). Morris Nichols was engaged by the Ad Hoc Committee effective December 4, 2022. Since the Ad Hoc Committee’s formation, additional Members have been joining the Ad Hoc Committee on an ongoing basis. Counsel will file updated statements as new Members join the Ad Hoc Committee, as required to comply with Bankruptcy Rule 2019.

3. Each Member of the Ad Hoc Committee has consented to Counsel’s representation of the Ad Hoc Committee. The Ad Hoc Committee’s retention of Counsel is solely with respect to the collective interests of the Ad Hoc Committee and does not encompass representation of any Member in its individual capacity in these Chapter 11 Cases. Each Ad Hoc Committee Member’s participation in the Ad Hoc Committee is solely in relation to the property interests (or related claims) disclosed on the attached exhibits. In addition, neither the Ad Hoc Committee nor any Member of the Ad Hoc Committee represents or purports to represent any other entities in connection with the Chapter 11 Cases.

4. The information contained in this Verified Statement and/or the exhibits attached hereto is intended only to comply with Bankruptcy Rule 2019 and is not intended for any other use or purpose, including, without limitation, any restriction or limitation on the rights, abilities, or arguments of the Ad Hoc Committee or any Member to customer property held by the Debtors

or any third parties.<sup>3</sup> Nothing in this Verified Statement or **Exhibit A** hereto, should be construed as (i) a limitation upon, or waiver of, the Ad Hoc Committee's or any Member's right to assert, file, and/or amend property interests, equitable remedies, causes of action, claims, and the like, if any, in accordance with applicable law and any orders entered in these Chapter 11 Cases, or (ii) an admission with respect to any fact or legal theory including that any property held by the Debtors is not property of the Debtors' estates under section 541 of the Bankruptcy Code.

5. Counsel reserves the right to amend or supplement this Verified Statement in accordance with the requirements set forth in Bankruptcy Rule 2019.

6. The undersigned verify that the foregoing is true and correct to the best of their knowledge.

*[Remainder of Page Intentionally Left Blank.]*

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<sup>3</sup> Due to privacy concerns, the addresses of the Members are not provided herein. To the extent requested by the Court, Counsel will provide the addresses to the Court for an in camera review and/or to other parties in interest who execute any necessary confidentiality agreement.

Date: March 22, 2023  
Wilmington, Delaware

*/s/ Eric D. Schwartz*

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**MORRIS, NICHOLS, ARSHT & TUNNELL LLP**

Eric D. Schwartz (No. 3134)

Matthew B. Harvey (No. 5186)

Paige N. Topper (No. 6470)

1201 North Market Street, 16th Floor

Wilmington, Delaware 19801

Telephone: (302) 658-9200

Facsimile: (302) 658-3989

[eschwartz@morrisnichols.com](mailto:eschwartz@morrisnichols.com)

[mharvey@morrisnichols.com](mailto:mharvey@morrisnichols.com)

[ptopper@morrisnichols.com](mailto:ptopper@morrisnichols.com)

-AND-

**EVERSHEDES SUTHERLAND (US) LLP**

Peter A. Ivanick

Sarah E. Paul

The Grace Building, 40th Floor

1114 Avenue of the Americas

New York, New York 10036

Telephone: (212) 389-5000

Facsimile: (212) 389-5099

[peterivanick@eversheds-sutherland.com](mailto:peterivanick@eversheds-sutherland.com)

[sarahpaul@eversheds-sutherland.com](mailto:sarahpaul@eversheds-sutherland.com)

-and-

Erin E. Broderick

227 West Monroe Street, Suite 6000

Chicago, Illinois 60606

Telephone: (312) 724-9006

Facsimile: (312) 724-9322

[erinbroderick@eversheds-sutherland.com](mailto:erinbroderick@eversheds-sutherland.com)

-and-

David A. Wender

Nathaniel DeLoatch

999 Peachtree St NE

Atlanta, Georgia 30309

Telephone: (404) 853-8000

Facsimile: (404) 853-8806

[davidwender@eversheds-sutherland.com](mailto:davidwender@eversheds-sutherland.com)

[nathanieldeatch@eversheds-sutherland.com](mailto:nathanieldeatch@eversheds-sutherland.com)

*Counsel to the Ad Hoc Committee of Non-US  
Customers of FTX.com*